

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al.,

Debtors.

2025 JUL 24 P 12:49

Chapter 11

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Case No. 22-11068 (KBO)

(Jointly Administered)

Response to FTX Recovery Trust's One Hundred Eighty-Sixth (Non-Substantive) Omnibus Objection to Certain Late Filed Proofs of Claim (Customer Claims)

I, George Sakhel, submit this Response to the *FTX Recovery Trust's One Hundred Eighty-Sixth (Non-Substantive) Omnibus Objection to Certain Late Filed Proofs of Claim (Customer Claims)* (the "Objection") [D.I. 31060], filed June 26, 2025, contesting the disallowance of my Claim #99959 for 0.501 Bitcoin (BTC) as late and without liability. I seek allowance based on excusable neglect for the late filing and blockchain evidence proving FTX's liability, which the Trust's incomplete records ignore.

a. Caption

See above.

b. Name of Claimant, Claim Number, and Basis for Amount of Claim

- **Name of Claimant:** George Sakhel
- **Claim Numbers:**
 - Claim #99959 (filed March 5, 2025, for 0.501 BTC, listed in Schedule 1, objected as late with no liability)
 - Related: Claim #87005 (0.501 BTC, objected in 153rd Omnibus Objection [D.I. 29725], Response filed April 8, 2025, adjourned [D.I. 30164])
 - Related: Claim #3265-70-GZMJW-881101830 (filed October 4, 2023, for 0.501 BTC)
 - Automatic Claim: \$1,373.08 USD and 0.00162 SOL (allowed for May 30, 2025, distribution, valued at ~\$1,373.11 including \$0.03 for SOL in November 2022, as asserted in Claim #99959)
- **Basis for Amount of Claim:** I assert 0.501 BTC, comprising 0.101 BTC deposited November 11, 2022 (pre-Petition), and 0.4 BTC on November 12, 2022 (post-Petition), into my FTX account with West Realm Shires Services Inc. Blockchain screenshots (Exhibits 1-2) verify these deposits, and Exhibit 3 proves FTX transferred 0.501 BTC to the Trust on March 13, 2023. The Trust's claim of "no liability" and a November 10, 2022, last deposit date on <https://claims.ftx.com/> ignores my evidence and omits my BTC, despite acknowledging my

automatic claim's value (\$1,373.11, including \$0.03 for 0.00162 SOL). My late filing (March 5, 2025) was due to website issues, excusable under Bankruptcy Rule 9006(b)(1).

c. Specific Factual Basis and Supporting Legal Argument

Factual Basis:

1. I deposited 0.101 BTC on November 11, 2022, and 0.4 BTC on November 12, 2022, per blockchain screenshots (Exhibits 1-2). Exhibit 3 confirms FTX transferred 0.501 BTC to the Trust on March 13, 2023, proving possession post-Petition.
2. The Trust's records are incomplete, omitting my 0.501 BTC and claiming my last deposit was November 10, 2022, on <https://claims.ftx.com/>, despite my blockchain evidence [Esposito Declaration, D.I. 31060-3]. My automatic claim (\$1,373.08 USD, 0.00162 SOL, valued at ~\$1,373.11 including \$0.03 for SOL in November 2022) is allowed, showing their records recognize my account but miss my BTC.
3. I filed Claim #3265-70-GZMJW-881101830 on October 4, 2023, delayed from September 29, 2023, due to website overload (Exhibit 5). I emailed support@ftx.com on October 4, 2023, flagging the zero BTC balance (Exhibit 4).
4. In December 2024, I tried filing again but faced mobile website issues (hidden dropdown menu), delaying Claim #99959 to March 5, 2025. My Response to the 153rd Objection [D.I. 29725] for Claim #87005, adjourned [D.I. 30164], raised these issues.

Legal Argument:

1. **Excusable Neglect (Bankruptcy Rule 9006(b)(1)):** The late filing of Claim #99959 (March 5, 2025) was due to website issues beyond my control—mobile glitches and a hidden dropdown in December 2024, similar to 2023's creditor overload. My diligence (October 2023 filing, email, December attempts) satisfies *Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P'ship*, 507 U.S. 380 (1993), warranting allowance.
2. **Equitable Relief (11 U.S.C. § 105(a)):** The Court can allow my claim, as FTX held 0.501 BTC post-Petition (Exhibit 3). Disallowing it is unfair when blockchain evidence proves liability.
3. **Prima Facie Validity (11 U.S.C. § 502(a)):** My claim is supported by immutable blockchain evidence (Exhibits 1-3), outweighing the Trust's flawed records, which ignore my November 11-12 deposits and March 2023 transfer.

d. Documentation and Evidence

- **Exhibit 1:** Blockchain Screenshot showing 0.101 BTC deposited to my FTX account. (November 11, 2022, 0.101 BTC deposit)
- **Exhibit 2:** Blockchain Screenshot showing 0.4 BTC deposited to my FTX account. (November 12, 2022, 0.4 BTC deposit)
- **Exhibit 3:** Blockchain Screenshot showing FTX's transfer of 0.501 BTC to the FTX Trust. (March 13, 2023, 0.501 BTC transfer to Trust)
- **Exhibit 4:** Email to support@ftx.com stating, "I just noticed my account shows the correct deposits but does not show the correct final balance of BTC." (October 4, 2023)

- **Exhibit 5:** Electronic Proof of Claim Confirmation, filed October 4, 2023. (#3265-70-GZMJW-881101830)

e. Contact Information

- **Name:** George Sakhel
- **Address:** 3419 Via Lido, #615, Newport Beach, CA 92663
- **Telephone Number:** 714-458-5436
- **Email Address:** livelyforest@protonmail.com
- I am the claimant and have authority to resolve this objection. Counsel may contact me directly.

Conclusion

I request the Court overrule the Objection as to Claim #99959, allow my 0.501 BTC claim based on excusable neglect and blockchain evidence, alongside my \$1,373.08 USD and 0.00162 SOL automatic claim, or set a hearing to consider my Response.

Dated: July 18, 2025

Respectfully submitted,



George Sakhel

Certificate of Service:

I, George Sakhel, certify that on July 18, 2025, I mailed copies of this Response, including all attached exhibits, via UPS Mail to:

- Office of the Clerk, United States Bankruptcy Court for the District of Delaware, 824 N Market Street, 3rd Floor, Wilmington, DE 19801;
- Sullivan & Cromwell LLP, Attn: Christian P. Jensen and Alexa J. Kranzley, 125 Broad Street, New York, NY 10004;
- Landis Rath & Cobb LLP, Attn: Kimberly A. Brown and Matthew R. Pierce, 919 Market Street, Suite 1800, Wilmington, DE 19801.



George Sakhel

Exhibit 1

Blockchain Screenshot (November 11, 2022)

 solscan.io/account/8V496BqD4XwmtHU6wBGk6RbEK36PcyEK3JWsMehE8Mw4#splTransfers



SOLSCAN
\$22.91 -1.23% MC: \$7.68 #12
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Tokens
Blockchain ▾
Resources ▾
Sign in


Account

8V496BqD4XwmtHU6wBGk6RbEK36PcyEK3JWsMehE8Mw4  

Overview

SOL Balance **0 SOL**

Transactions SOL Transfers **SPL Transfers** Token Accounts Stake Accounts Domains

Total 13 transactions, almost 2 years ago 

Signature	Block	Time (UTC)	Change Amount	Token
 23cUuYLVtAPcywAbZ6LrzMTX2VNzL...	#182366668	03-13-2023 13:47:15	-0.501	 Wrapped Bitcoin (Sollet) (BTC)
 5MUvS95ZhOPCLtQbDaxiywuN6UgZL5L...	#160549581	11-12-2022 00:28:44	+0.4	 Wrapped Bitcoin (Sollet) (BTC)
 3PGZAh7XNWvdcY4NJvKJC55sT8qWwo...	#160545012	11-11-2022 23:47:56	+0.101	 Wrapped Bitcoin (Sollet) (BTC)

More info

Stake **0 SOL**

 solscan.io/tx/3PGZAh7XNWvdcY4NJvKJC55sT8qWwoLVGZG4TABHxngzJaS9bAE2NZemXRF1tMBDdbAd1BX1Q29kwcsNnx7XDAV

SOLSCAN
\$22.91 -1.23% MC: \$7.68 #12
Home
Analytics ▾
Defi ▾
NFTs
Tokens
Blockchain ▾
Resources ▾
Sign in


Transaction Details

Overview SOL Balance Change Token Balance Change

Signature
3PGZAh7XNWvdcY4NJvKJC55sT8qWwoLVGZG4TABHxngzJaS9bAE2NZemXRF1tMBDdbAd1BX1Q29kwcsNnx7XDAV 

Block
160545012 

Timestamp
11 months ago  November 11, 2022 23:47:56 +UTC

Result
 Success  Finalized (MAX confirmations)

Signer
Gd9nVhtbpWRk9eh8iTGBop5VB4FJWPUvoqqVB2FD2Grs 

Fee
0.000005 SOL

Main Actions
Token transfer

 Tx Map
 Transfer from Gd9nVhtbpWRk9eh8iTGBop5VB4FJWPUvoqqVB2FD2Grs to 8V496BqD4XwmtHU6wBGk6RbEK36PcyEK3JWsMehE8Mw4 for 0.101  BTC 

Transaction Version
LEGACY

Previous Block Hash
7ZKqU6FDDyfgRji1E6KtKcxYCs458CwqrGJh6XgCcGMm

Your Notes
 Add notes

Exhibit 2

Blockchain Screenshot (November 12, 2022)

 solscan.io
tx/5MUvS95ZhQPCltQbDaxiywuN6UgZL5LBnjRZRbZq2NZNAvLd7K6u7BqGzPhgLJrLy5XRrX6SjorXqj4UTn9jPCd7
 

SOLSCAN
≡ \$22.91 -1.23% MC: \$7.68 #12
Home
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Defi ▾
NFTs
Tokens
Blockchain ▾
Resources ▾
Sign in


Transaction Details

Overview
SOL Balance Change
Token Balance Change

Signature: 5MUvS95ZhQPCltQbDaxiywuN6UgZL5LBnjRZRbZq2NZNAvLd7K6u7BqGzPhgLJrLy5XRrX6SjorXqj4UTn9jPCd7 

Block: # 160549581 

Timestamp: 11 months ago (November 12, 2022 00:28:44 +UTC)

Result: Success Finalized (MAX confirmations)

Signer: Gd9nVhhttpWRk9eh8iTGBop5VB4FJWP0UvoqgVBZFD2Grs 

Fee: 0.000005 SOL

Main Actions: **Token transfer**

  Tx Map

Transfer from Gd9nVh...FD2Grs to 8V496B...hE8Mw4 for 0.4 BTC 

Transaction Version: LEGACY

Previous Block Hash: J1ZrsM6UKRBo3AXztSmYvGVzqTBGH0HhupSg7S4xeeoV

Your Notes:  Add notes

Exhibit 3

Blockchain Screenshot (March 13, 2023)

🔍
🔗
solscan.io/tx/23cUuYLvtAPcywWAbZ6LzMTX2VNzL6kpaoRMVPZMvK8b2YSMzPjcu6WwoJ6wy7x9npB82sSrEkUSRy1SsoPZPHj
🛡️
⚠️

SQLSCAN
\$22.91 -1.23%
MC: \$7.6B #12
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Transaction Details
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[Overview](#) [SOL Balance Change](#) [Token Balance Change](#)

Signature: 23cUuYLvtAPcywWAbZ6LzMTX2VNzL6kpaoRMVPZMvK8b2YSMzPjcu6WwoJ6wy7x9npB82sSrEkUSRy1SsoPZPHj [🔗](#)

Block: #18236668 [🔗](#)

Timestamp: 7 months ago (March 13, 2023 13:47:19 +UTC)

Result: Success - Finalized (MAX confirmations)

Signer: EHn1SsTH3yfH6UFHcEjTjzMdMjxL7yKjEZMFU53VvTze [🔗](#)
#V496BgD4XwmthHU6wBGk6RbEK36PcyEK3JWsMehE8Mw4 [🔗](#)

Fee: 0.00001 SOL

Main Actions: [Token transfer](#)

[Tx Map](#)

Transaction Version: LEGACY

Previous Block Hash: BApDJv3jFQ4oY4Rzb8nziCgQjwmgCLgTlbRpQE711riR

Your Notes: [Add notes](#)

Exhibit 4

Email to support@ftx.com

[8] Balance not reflecting deposits

From  livelyforest@protonmail.com
To support@ftx.com

★ Oct 4, 2023

Hi,
I just noticed my account shows the correct deposits but does not show the correct final balance of BTC.

Please advise.

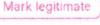
From  support@ftx.com
To livelyforest@protonmail.com

☆ Oct 4, 2023

Our system flagged this message as a phishing attempt. Please check that it is legitimate. [Learn more](#)



We apologize for the delay in getting back to you. We have received a high volume of emails in the past few days. Your request (212234) has been received and will be reviewed by our support staff.

To add additional comments, reply to this email.

Exhibit 5

Electronic Proof of Claim Confirmation

[2] Electronic Proof of Claim_3265-70-GZMJW-881101830[[CSALT#900807#CF]] between Kroll and George Sakhel is Signed and Filed! Your confirmation ID is 3265-70-GZMJW-881101830.

noreply.efiling@ra.kroll.com

From: noreply.efiling@ra.kroll.com
To: livelyforest@protonmail.com, livelyforest@protonmail.com

Oct 4, 2023

Oct 4, 2023

You have completed your submission of Electronic Proof of Claim_3265-70-GZMJW-881101830. Please see the attached for your completed proof of claim form and submitted supporting documentation.

Thank you for your electronic submission. Please do not send a duplicate of this submission by any other method of return.

*Effective March 29, 2022, Prime Clerk LLC changed its name to Kroll Restructuring Administration LLC. All emails sent by Kroll Restructuring Administration LLC will now have the domain @Kroll.com. We recommend that you update your email permissions for "@Kroll.com" to continue receiving messages from us. Emails sent to the domain @primeclerk.com will continue to be received. Please be assured that your information remains secure and is only being used by Kroll Restructuring Administration LLC in connection with the purpose for which it is held.

430.43 KB 2 files attached

Customer Claim Form - 9d579...ef.pdf 82.09 KB ftx.pdf 347.74 KB

GEORGE SAKHEL
(714) 458-5436
THE UPS STORE #0049
STE 105
4780 IRVINE BLVD
IRVINE CA 92620-1998

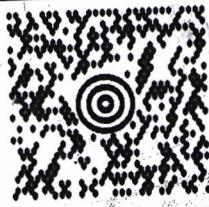
1 LBS 1 OF 1
SHP WT: 1 LBS
DATE: 18 JUL 2025

SHIP US BANKRUPTCY COURT DISTRICT OF DW
TO: OFFICE OF THE CLERK
824 N MARKET ST

J.S.M.S
X-RAY

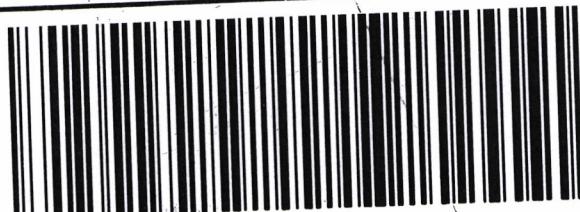
WILMINGTON DE 19801-3024

DE 197 9-25



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